

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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HAMILTON ADVANCE, INC.

Plaintiff,

-against-

22-CV-8347 (LAK) (KHP)

**INITIAL CASE MANAGEMENT
CONFERENCE ORDER**

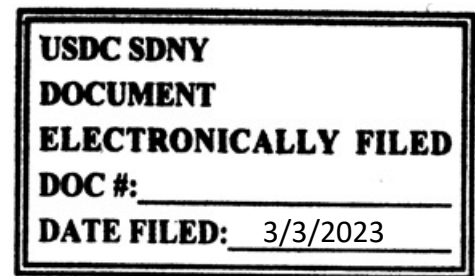
THE BUZAGLO GROUP INC., MEIR
BUZAGLO a/k/a JACK HILL; PREMIUM
CAPITAL FUND d/b/a PREMIUM
CONSOLIDATION; AMRK
ENTERPRISES, INC.; RALPH R. MADEB;
ALBERT MIZRAHI A/K/A MITCH
CROWDER; MASCHE ALBUKAI AKA
RAY TUCKER; MOSHE WIRELESS INC.;
ISAAC SIWEID; MAGI HALABI A/K/A
JESSICA GREES; ESTY HARA A/K/A
EMILY SPENSER; AND ELAN AZIZIAN
A/K/A MATT WOLFE,

Defendants.

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KATHARINE H. PARKER, United States Magistrate Judge:

On March 2, 2023, the parties appeared for an Initial Case Management Conference. After review of the pleadings and consultation with the parties, the following Scheduling Order is entered pursuant to Rule 16 of the Federal Rules of Civil Procedure:

Pleadings, Parties, and Motions. The parties shall have until **April 17, 2023** to amend the pleadings and join parties. No further amendments or joinder of parties thereafter absent good cause. The deadline for Defendants to answer the complaint or move to dismiss is **April 3, 2023**. The parties should write to the Court to propose a briefing schedule for the motion to dismiss if Defendants choose to move to dismiss in lieu of answering the complaint.



Discovery. The deadline to complete fact discovery is **September 29, 2023**. The deadline to exchange initial disclosures is **March 16, 2023**. The deadline to submit a proposed protective order to the Court is **March 16, 2023**. The deadline for initial document requests is March 16, 2023.

Discovery Disputes. The parties shall follow the Court's Individual Procedures with respect to any discovery disputes. See <https://nysd.uscourts.gov/hon-katharine-h-parker>.

Rule 1 and Rule 26(b)(1). Counsel shall comply with Rule 1 and Rule 26(b)(1) in the conduct of discovery.

Document Requests. Counsel shall be fully familiar with their obligations under Rules 34 and 26(g) and consider and discuss ways to ensure compliance and minimize disputes regarding overbreadth and specificity of requests and responses. A failure to comply with this responsibility carries serious consequences. Requests for any and all documents on a broad topic are presumptively improper. Likewise, courts have held that an objection that does not appropriately explain its grounds is forfeited. See, e.g., *Wesley Corp. v. Zoom T.V. Prods., LLC*, No. 17-100212018, 2018 WL 372700, at *4 (E.D. Mich. Jan. 11, 2018); *Fischer v. Forrest*, No. 14 Civ. 01304 (PAE) (AJP), 2017 WL 773694 (S.D.N.Y. Feb. 28, 2017) (“[A]ny discovery response that does not comply with Rule 34’s requirement to state objections with specificity (and to clearly indicate whether responsive material is being withheld on the basis of objection) will be deemed a waiver of all objections (except as to privilege).”).

Status Letter. The parties shall file a joint status letter by **April 17, 2023**, updating the Court on the status of discovery and the parties’ request for a settlement conference.

SO ORDERED.

DATED: New York, New York
March 3, 2023



KATHARINE H. PARKER
United States Magistrate Judge